

1 CONTE C. CICALA, State Bar No. 173554
2 *conte.cicala@clydeco.us*
3 CLYDE & CO US LLP
4 101 Second Street, 24th Floor
5 San Francisco, California 94105
6 Telephone: (415) 365-9800
7 Facsimile: (415) 365-9801

8 Attorneys for Plaintiff
9 MITSUI O.S.K. LINES, LTD.

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

MITSUI O.S.K. LINES, LTD.,

Plaintiff,

v.

SHINE INTERNATIONAL
TRANSPORTATION (SHENZHEN)
LIMITED, R.T. EXPRESS
INTERNATIONAL, INC., TROY
CONTAINER LINE, LTD. and DOES
THREE THROUGH TWENTY,

Defendants.

Case No. 4:15-cv-03343-KAW

**STIPULATION TO CONTINUE CASE
MANAGEMENT CONFERENCE;
~~[PROPOSED]~~ ORDER**

WHEREAS, pursuant to stipulation, the default of Defendant Shine International Transportation (Shenzhen) Limited ("Shine") was set aside on November 30, 2015. On December 1, 2015, MOL filed an amended complaint that added two additional defendants. MOL served the amended complaint on Shine on December 1, 2015, and is in the process of serving the two newly-added defendants; and,

WHEREAS, since December, MOL and Shine have been engaged in informal document exchanges and settlement discussions and would like to continue this process for as long as it remains productive; and,

WHEREAS, consistent with the foregoing, MOL and Shine respectfully believe that certain dates should be extended/continued accordingly.

THEREFORE, the parties hereto do stipulated and agree and request the Court to order as follows:

- 1) To extend the date for Shine to respond to the Amended Complaint to and including February 5, 2016
- 2) To continue the CMC scheduled for January 19, 2016 to March 29, 2016;

Respectfully submitted,

Dated: January 14, 2016

CLYDE & CO US LLP

By: /s/ Conte C. Cicala
Conte C. Cicala
Attorneys for Plaintiff
MITSUI O.S.K. LINES, LTD.

Dated: January 14, 2016

GONZALEZ DEL VALLE LAW

By: /s/ Henry P. Gonzalez
Henry P. Gonzalez
Attorney-in-Fact
Shine International Transportation (Shenzhen)
Limited

L.R. 5-1(i) ATTESTATION

I, Conte C. Cicala, am the ECF user whose ID and password are being used to file the attached Stipulation to Continue Case Management Conference; [Proposed] Order.

In compliance with Local Rule 5-1, I hereby attest that concurrence in the filing of this document has been obtained from the other signatories.

Dated: January 14, 2016

/s/ Conte C. Cicala
Conte C. Cicala

1 **[PROPOSED] ORDER**
2
3

Pursuant to stipulation, and good cause having been shown thereby, this Court hereby
3 ORDERS as follows:

4

5 1) Shine shall have a further extension to respond to the Amended Complaint to and
6 including February 5, 2016

7 2) The Case Management Conference scheduled for January 19, 2016 is continued to
8 March 29, 2016, at 1:30 p.m.

9 IT IS SO ORDERED.
10

Dated: 1/15/16
11

12 
13

14 UNITED STATES MAGISTRATE JUDGE
15

CLYDE & CO US LLP
101 Second Street, 24th Floor
San Francisco, California 94105
Telephone: (415) 365-9800